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February 25, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, D.C. 20554

Received & Inspected
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FCC Mail Room

Re: Notice of ex parte presentation MB Docket No. 14-57, Applications of Comcast Corp., Time Warner Cable, Inc., Charter Communications, Inc. and SpinCo For Consent to Transfer Control of Licenses and Authorizations

Dear Ms. Dortch:

On February 18, 2015, eight representatives of the Coalition for Broadband Equity ("the Coalition") participated in a conference call attended by 13 members of the Commission staff to discuss issues involved in the above-referenced docket.

Representatives of the Coalition participating in the call included: Ellis Jacobs, Attorney, Advocates for Basic Legal Equality, Inc., Dayton, OH; Bill Callahan, Director, Connect Your Community 2.0, Cleveland, OH; Rebecca Ranallo, Information & Technology Literacy Manager, Cuyahoga County Public Library, Parma, OH; Wanda Davis, Executive Director, Ashbury Senior Computer Community Center, Cleveland, OH; Nancy Olson, Chief Information Officer, City of Milwaukee, WI; Scott Gifford, Vice-President, Matrix Human Services, Detroit, MI; and Dr. Michael Schoop, President, Metropolitan Campus, Cuyahoga Community College, Cleveland, OH.

Members of the Commission staff attending the call included: Keith Ingram, Elizabeth Cuttner, Adam Lazaros, William D. Freedman, Allen Barna, Marcia Glauberman, Amanda Burkett, Adam Copeland, Ben Childers, Jessica Campbell, William Dever, Hillary DeNigro and John Kiefer.

Mr. Jacobs asked all participants on the call to introduce themselves. Following these introductions Mr. Callahan briefly presented the main points of the Coalition's perspective on the proposed Transactions. These included the following:

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1. Approval of the proposed Transactions will result in the communities represented by members of the Coalition being served by Charter Communications or GreatLand Networks, rather than Comcast. Thus residents of our communities stand to gain nothing from any expansion or reform of Comcast's Internet Essentials program.
2. But our communities are among those most in need of measures to promote broadband access and use by lower-income households, as demonstrated by household Internet access data in the Census' recent American Community Survey as well as the Commission's own census tract-level data from Form 477 reports.
3. A number of parties including the California Emerging Technologies Fund, the Cities of Los Angeles and New York, and others have asked the Commission to require major expansion and reform of Internet Essentials as part of any settlement or order which allows the Transactions to proceed. It is critical for communities which would be divested to Charter or GreatLand under the terms of the Transaction, rather than served by Comcast including its Internet Essentials program, not to be marginalized in the process of formulating or negotiating any such requirement.
4. Charter Communications, unlike Comcast, has no experience of investing in low income broadband adoption, and very little history of community partnerships of any kind. GreatLand Networks, a nascent enterprise, has no operating history. With the best of intentions, an agreement or imposed requirement for Charter and GreatLand to simply imitate Internet Essentials would take years to implement at best, and could easily fail to achieve any significant community traction. Our communities can't afford to wait and see.
5. The Coalition is composed largely of organizations that ran very effective digital literacy and adoption programs in our communities as part of the U.S. Commerce Department's Broadband Technology Opportunities Program (BTOP), and have longstanding commitments to this work. Our goal is to get Charter and GreatLand to work with us, in the framework of a Commission-ordered plan, on collaborative initiatives in our communities that capitalize on that experience.

Mr. Callahan along with Mr. Gifford, Mrs. Davis, Ms. Ranallo and Ms. Olson provided brief descriptions of the BTOP-supported programs they managed and implemented in their respective communities of Detroit, Cleveland, suburban Cuyahoga County and Milwaukee. Mr. Callahan then concluded his presentation and invited questions.

Mr. Freedman asked whether the Coalition representatives had opinions or recommendations regarding the Internet Essentials program. Mr. Callahan responded with several points:

- As a Comcast-only program, Internet Essentials is not relevant to residents of the Coalition's participating communities other than Detroit, and will have no future relevance in any of our communities if the proposed Transactions are allowed.
- The Coalition is generally sympathetic to the recommendations of the California Emerging Technologies Fund for improvement of the Comcast program. For example, we agree on the critical importance of ambitious numerical goals tied to a clear framework for accountability.
- There are important differences between the statewide environment for broadband adoption programming in California and those in Ohio, Michigan and Wisconsin -- not to mention the disparity between Comcast's experience and capacity and those of Charter and GreatLand. So rather than seeking a one-size-fits-all model for low-income Internet adoption based on Internet Essentials, Coalition members would prefer to work with Charter and GreatLand, under the Commission's aegis, to develop collaborative strategies tailored to their business models and to the specific capacities and opportunities in our communities.
- Internet Essentials' exclusive focus on families of K-12 students eligible for Federal school lunch subsidies is clearly inadequate. For example, the demographic data for about 8,000 individuals who sought basic computer training provided by the 2010-13 Connect Your Community BTOP project in Cleveland and East Cleveland indicates that the largest cohort -- the peak of our participant bell curve -- consisted of older working-age individuals (late 40s, 50s and 60s) with no particular likelihood of school-age children in their households.
- In its current form Internet Essentials is primarily a special rate plan, with little financial investment in digital literacy training or community marketing. In our experience helping tens of thousands of lower-income adults to become home broadband users and subscribers, a special affordable low-cost service option is very helpful but not sufficient for success. For example, over 75% of the Connect Your Community project's 23,000 new low-income subscribers, once they had completed training and acquired home computers, signed up for normal residential Internet accounts from their local DSL or cable modem service providers.

Dr. Schoop reiterated the importance of aligning sustainable broadband adoption efforts in lower-income communities like Cleveland with the capacities, grassroots relationships and legitimacy of established community-based training programs.

Mr. Callahan concluded by thanking the Commission staff for the opportunity to discuss the Coalition's perspective.

Mr. Jacobs and the Commission staff concluded the call.

Yours,



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